

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 650**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY  
OF AN ORDER (I) APPROVING (A) PROCEDURES FOR THE SALE OR OTHER  
DISPOSITION OF MISCELLANEOUS ASSETS AND (B) THE SALE OR OTHER  
DISPOSITION OF MISCELLANEOUS ASSETS FREE AND CLEAR OF LIENS,  
CLAIMS, INTERESTS, AND ENCUMBRANCES IN ACCORDANCE WITH  
SUCH PROCEDURES, AND (III) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. On October 31, 2023 the Debtors filed the *Debtors' Motion for Entry of an Order (I) Approving (A) Procedures for the Sale or Other Disposition of Miscellaneous Assets and (B) the Sale or Other Disposition of Miscellaneous Assets Free and Clear of Liens, Claims, Interests, and Encumbrances in Accordance with Such Procedures, and (III) Granting Related Relief* [Docket No. 650] (the “**Motion**”). Attached to the Motion was, among other things, a proposed form of order approving the relief requested in the Motion (the “**Proposed Order**”).

2. Pursuant to the notice filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served so as to be received no later than **November 14, 2023 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”). The objection deadline was

---

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

extended for the Ohio Lead Plaintiffs (the “**Lead Plaintiffs**”) until November 15, 2023 at 4:00 p.m. (ET).

3. Prior to the Objection Deadline, the Debtors received informal responses (the “**Informal Responses**”) from the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”), the U.S. Securities and Exchange Commission (the “**SEC**”) and the Lead Plaintiffs. Other than the Informal Responses, the Debtors received no other responses to the Motion and no objections or responses were filed on the Docket. The Informal Responses were resolved by revisions to the Proposed Order, and such revised order is attached hereto as **Exhibit A** (the “**Revised Order**”). For the convenience of the Court and all parties in interest, a blackline of the Revised Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the proposed form of order granting the relief requested in the Motion, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 16, 2023  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)  Doah Kim (admitted <i>pro hac vice</i>)  RJ Szuba (admitted <i>pro hac vice</i>)  555 South Flower Street, Suite 2700  Los Angeles, CA 90071  Telephone: (213) 620-7700  rkampfner@whitecase.com  doah.kim@whitecase.com  rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
---	--